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7 *Attorneys for Defendant Synchrony Bank*

8 **IN THE UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 Shawnae Dowe,

11 Plaintiff,

12 vs.

13 Equifax Information Services, LLC;
14 Experian Information Solutions, Inc.;
Flagstar Bank; and
Synchrony Financial d/b/a SYNCB/CareCredit,

15 Defendants.
16

Case No. 2:21-cv-01751-JCM-EJY

**JOINT MOTION AND ORDER
TO EXTEND DEFENDANT
SYNCHRONY BANK'S TIME TO
FILE RESPONSE TO COMPLAINT**

[FIRST REQUEST]

17
18 COME NOW Plaintiff Shawnae Dowe ("Plaintiff") and Defendant Synchrony Bank
19 (misidentified as "Synchrony Financial d/b/a SYNCB/CareCredit," and hereinafter referred to
20 as "Synchrony"), by counsel and pursuant to Local Rule IA 6-1, jointly move for an extension
21 as follows:

- 22 1. On September 22, 2021, Plaintiff filed a Complaint with this Court [ECF No. 1].
- 23 2. Synchrony was served with the Complaint on September 30, 2021.
- 24 3. Synchrony's response to the Complaint is due by October 21, 2021.
- 25 4. The parties are engaging in preliminary discussions in this matter. In order to
26 explore the possibility of an early resolution, Synchrony desires an extension of 28 (twenty-
27 eight) days, up to and including November 18, 2021, to file a response to the Complaint.
- 28 5. Counsel for Synchrony conferred with counsel for Plaintiff regarding this Joint

1 Motion. Counsel for Plaintiff agrees to the requested extension.

2 6. This Joint Motion is filed in good faith and not for dilatory or other improper
3 purpose. Plaintiff would not suffer any prejudice by the Court permitting Synchrony the
4 requested extension of time and has consented to the requested extension.

5 7. This is the first request for extension of time for Synchrony to respond to the
6 Complaint.

8 DATED: October 15, 2021.

DATED: October 15, 2021.

9 /s/ Matthew R. Tsai

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/s/ Michael Kind

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14 *Counsel for Defendant Synchrony Bank*

Counsel for Plaintiff

15 **ORDER**

16 **IT IS SO ORDERED.**

17 
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: October 15, 2021